

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO:** _____

v. : **DATE FILED:** _____

CARLOS MARTINEZ SANTIAGO : **VIOLATIONS:**
: **18 U.S.C. §2113(d) (armed bank robbery - 2**
: **counts)**
: **18 U.S.C. §924(c)(1) (using and carrying a**
: **firearm during and in relation to a crime of**
: **violence - 2 counts)**
: **18 U.S.C. §922(g)(1) (felon in possession of a**
: **firearm - 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 10, 2004, in Lancaster, in the Eastern District of Pennsylvania,
defendant

CARLOS MARTINEZ SANTIAGO

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Waypoint Bank, 100 East King Street, Lancaster, Pennsylvania, lawful currency of the United States, that is, approximately \$2,817, belonging to, and in the care, custody, control, and management and possession of Waypoint Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, defendant **CARLOS MARTINEZ SANTIAGO** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Waypoint Bank, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2004, in Lancaster, in the Eastern District of Pennsylvania,
defendant

CARLOS MARTINEZ SANTIAGO

knowingly used and carried a firearm, that is, a .380 caliber Smith and Wesson handgun, Model SW380, serial number RAJ7241, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, armed bank robbery in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2004, in Lancaster, in the Eastern District of Pennsylvania,
defendant

CARLOS MARTINEZ SANTIAGO

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Fulton Bank, 1 Penn Square, Lancaster, Pennsylvania, lawful currency of the United States, that is, approximately \$7,292, belonging to, and in the care, custody, control, and management and possession of Fulton Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, defendant CARLOS MARTINEZ SANTIAGO knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Fulton Bank, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2004, in Lancaster, in the Eastern District of Pennsylvania,
defendant

CARLOS MARTINEZ SANTIAGO

knowingly used and carried a firearm, that is, a .380 caliber Smith and Wesson handgun Model, sw
380, serial number RAJ7241 during and relation to a crime of violence for which he may be
prosecuted in a Court of the United States, that is, armed bank robbery in violation of Title 18
United States Code, Section 2113(d).

In violation of title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2004, in Lancaster, in the Eastern District of Pennsylvania,
defendant

CARLOS MARTINEZ SANTIAGO,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a .380 caliber Smith and Wesson handgun, Model SW380, serial number RAJ7241.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), set forth in Counts Two, Four, and Five of this indictment, the defendant

CARLOS MARTINEZ SANTIAGO

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

One .380 caliber Smith & Wesson handgun, Model SW380, serial number RAJ7241.

All pursuant to Title 18, United States Code, Section 924(d), and Title 18, United States Code, Section 2461(c) .

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney

